

Attorney Docket No. P15306-US1  
Customer Number 27045

### **REMARKS/ARGUMENTS**

#### **1.) Claim Amendments**

The Applicants have amended claims 1-5, 7, and 9-17. Claims 18 and 19 have been added. Accordingly, claims 1-19 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

#### **2.) Claim Rejections – 35 U.S.C. § 102(e)**

In paragraphs 4-5 of the Office Action, the Examiner rejected claims 1, 2, 4-9, 11-13 and 15-17 under 35 U.S.C. § 102(e) as being anticipated by Foti (US 2002/0194378 A1). The Applicants have amended the claims to better distinguish the claimed invention from Foti. The Examiner's consideration of the amended claims is respectfully requested.

In paragraph 6, the Examiner first discussed the rejection of independent claim 17, and cited several paragraphs from Foti discussing Foti's Media Resource Function (MRF). However, Foti has merely enhanced the known MRF to remove source addresses and replace them with alias addresses. This functionality is entirely different from the claimed invention. Note also that Foti's FIGS. 1 & 2 clearly show separate network nodes for the P-CSCF, the I-CSCF, and the S-CSCF call-control functions, while the objective of the present invention is to combine the functionality of all such call-control functions in a single node that can selectively perform the functions of a selected one of the call-control functions.

Accordingly, claim 17 has been amended to recite:

17. An architecture for a communications node in a Session Initiation Protocol (SIP) telecommunications network, said node performing a plurality of call-control functions and being implemented on a single physical platform, said architecture comprising:

a plurality of application-specific logic blocks, each of the application-specific logic blocks performing application-level logic corresponding to one of the plurality of call-control functions;

a plurality of SIP functional blocks for performing SIP behavior-handling functions common to the plurality of call-control functions;

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means for selectively interfacing the SIP functional blocks with selected application-specific logic blocks, wherein selected combinations of SIP functional blocks and application-specific logic blocks are operable to perform selected ones of the call-control functions; and  
an operating system supporting all of the SIP functional blocks and application-specific logic blocks.

Thus, claim 17 has been amended to recite a plurality of *application-specific* logic blocks and means for *selectively* interfacing SIP functional blocks with selected application-specific logic blocks to perform selected call-control functions. In addition, the limitation of a common operating system, which was previously recited in the preamble, has been moved into the body of the claim and clarified to be an operating system supporting all of the SIP functional blocks and application-specific logic blocks. Basis for the amendments to claim 17 is found in the originally filed specification in paragraphs [0027] through [0036] and FIG. 3.

The Applicants respectfully submit that a communication node architecture that selectively interfaces SIP functional blocks with selected application-specific logic blocks to create different call-control functions in a single node is not taught or suggested by Foti. Therefore, the withdrawal of the rejection under § 102 and the allowance of claim 17 are respectfully requested.

New claims 18 and 19 depend from amended claim 17 and recite further limitations in combination with the novel elements of claim 17. Therefore, the allowance of claims 18 and 19 is respectfully requested.

In paragraph 7, the Examiner discussed the rejection of independent claim 1, and in addition to the paragraphs from Foti cited for claim 17, the Examiner also noted that Foti discloses a mapping table in the form of an address translation table. However, Foti totally fails to disclose or suggest a communication node architecture that selectively interfaces functional blocks in a common engine module with selected application-specific logic blocks to create different call-control functions.

Accordingly, claim 1 has been amended similarly to claim 17 to recite:

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1. An architecture for a communications node in a telecommunications network, said node performing a plurality of call-control functions using a single physical platform, said architecture comprising:

a plurality of application-specific logic blocks, each of the application-specific logic blocks performing application-level logic corresponding to one of the plurality of call-control functions; and

an engine module interfaced with and supporting all of the application-specific logic blocks, said engine module comprising:

a plurality of functional blocks, selected ones of said functional blocks being operable to perform selected ones of the call-control functions when interfaced with selected ones of the application-specific logic blocks;

at least one mapping table that selectively interfaces selected application-specific logic blocks with the plurality of functional blocks in the common engine module, and selects appropriate functional blocks for matching with each application-specific logic block to create a specific call-control function; and

an operating system supporting all of the functional blocks and application-specific logic blocks

Basis for the amendments to claim 1 is found in the originally filed specification in paragraphs [0027] through [0036] and FIG. 3. The Applicants contend that amended claim 1 is allowable for the same reasons discussed above for claim 17. Therefore, the withdrawal of the rejection under § 102 and the allowance of claim 1 are respectfully requested.

The Examiner also rejected dependent claims 2 and 4-8 under § 102. However, claims 2 and 4-8 depend from amended claim 1 and recite further limitations in combination with the novel elements of claim 1. Therefore, the allowance of claims 2 and 4-8 is respectfully requested.

In paragraph 14, the Examiner discussed the rejection of independent claim 9, and in addition to the paragraphs from Foti cited for claim 17, the Examiner noted that Foti discloses a P-CSCF, an I-CSCF, and an S-CSCF. The Examiner also cited the HSS in Foti as being a common engine module. The Applicants respectfully disagree that the nodes cited in Foti are the equivalent of the limitations recited in claim 9.

As noted above, FIGS. 1 & 2 of Foti clearly indicate separate network nodes for the P-CSCF, the I-CSCF, and the S-CSCF call-control functions. Claim 9, on the other hand clearly recites that these functions are integrated in a single node. The Applicant

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has amended claim 9 to move from the preamble to the body of the claim, the limitation stating that the architecture is implemented on top of a single operating system and a single physical platform. Basis for the amendments to claim 1 is found in the originally filed specification in paragraphs [0027] through [0036] and FIG. 3.

The Applicant also disagrees with the Examiner's classification of a Home Subscriber Server (HSS) as an engine module common to the application-specific logic blocks. The HSS has no such functionality, and does not include SIP behavior functions and SIP stack functions. The Examiner cites Foti paragraph [0034], but that paragraph merely recites that the HSS operates as a location register, and does not discuss any functionality of an engine module or the recited SIP behavior functions and SIP stack functions.

As noted above, the objective of the present invention is to combine the functionality of call-control functions such as the P-CSCF, I-CSCF, and S-CSCF in a single node that can selectively perform the functions of a selected one of the call-control functions. This is not taught or suggested by Foti. Therefore, the withdrawal of the rejection under § 102 and the allowance of claim 9 are respectfully requested.

The Examiner also rejected dependent claims 11 and 12 under § 102. However, claims 11 and 12 depend from amended claim 9 and recite further limitations in combination with the novel elements of claim 9. Therefore, the allowance of claims 11 and 12 is respectfully requested.

In paragraph 16, the Examiner discussed the rejection of independent claim 13, and in addition to the paragraphs from Foti cited for claim 17, the Examiner noted that Foti discloses assigning a network logic-block address to each of the SIP stack functions and call-control behavior functions. The Applicant has made clarifying amendments to claim 13, similar to the other independent claims discussed above, to highlight the differences from Foti.

The Applicants contend that amended claim 13 is allowable for the same reasons discussed above for claim 17. Therefore, the withdrawal of the rejection under § 102 and the allowance of claim 13 are respectfully requested.

The Examiner also rejected dependent claims 15 and 16 under § 102. However, claims 15 and 16 depend from amended claim 13 and recite further limitations in

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combination with the novel elements of claim 13. Therefore, the allowance of claims 15 and 16 is respectfully requested.

### **3.) Claim Rejections – 35 U.S.C. § 103(a)**

The Examiner rejected claims 3, 10 and 14 under 35 U.S.C. § 103(a) as being unpatentable over Foti in view of Wang (US 2002/0131395 A1). The Examiner cited Wang for showing a plurality of servlet APIs operable to perform a plurality of supplementary services, and a servlet manager operable to provide selected supplementary services to any of the application-level logic blocks.

The Applicants disagree that the combination of Foti and Wang renders claims 3, 10, and 14 obvious because Foti fails to teach or suggest the claimed limitations discussed above. The servlet APIs and servlet manager discussed in Wang do not teach or suggest the limitations that are not taught or suggested by Foti. Thus, a prima facie case of obviousness has not been established, as required by MPEP 2143. Therefore, the withdrawal of the rejection under § 103 and the allowance of claims 3, 10, and 14 are respectfully requested.

### **4.) Prior Art Not Relied Upon**

In paragraph 22 of the Office Action, the Examiner stated that the prior art made of record and not relied upon is considered pertinent to the Applicants' disclosure. However, Applicants' reading of these references has failed to reveal any teaching or suggestion of a communication node architecture that selectively interfaces SIP functional blocks with selected application-specific logic blocks to create different call-control functions in a single node, as claimed by the Applicants.

## **CONCLUSION**

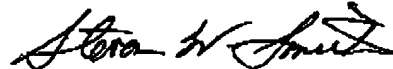
In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 1-19.

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The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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